



Debra L. Wabnik
Partner

Direct 516.812.4504
Fax: 516.812.4604
dwabnik@staggwabnik.com

Also Admitted NJ

401 Franklin Avenue, Suite 300, Garden City, NY 11530
T 516.812.4550

staggwabnik.com

331 Newman Springs Road, Building 1, 4th Floor, Suite 143, Red Bank, NJ 07701 | T 732.784.1586
1111 Summer Street, 5th Floor, Stamford, CT 06905 | T 203.967.4000

April 18, 2023

Via ECF

Honorable Jennifer L. Rochon
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: Watson v. New York City Economic Development Corp., et al.
Civil Action No.: 22-cv-01660-JLR

Dear Judge Rochon:

We represent Plaintiff Jerald Watson (“Plaintiff”) in the above-referenced matter and submit this request on consent with Defendants New York City Economic Development Corporation and Hester Muis (collectively “Defendants”).

The parties have been referred to Magistrate Judge Katherine H. Parker for a settlement conference. The parties have their first telephone conference scheduled with her for April 25, 2023.

Therefore, the parties request that the April 26th pre-trial conference with Your Honor be adjourned until after the settlement conference which should be scheduled shortly. This is the first request for an adjournment of this conference.

In addition, the parties respectfully request that the deadline to complete discovery in Your Honor’s January 25, 2023 Amended Civil Scheduling Order (Dkt. #37) be extended to June 22, 2023. This is the third request for an extension of these deadlines.

Honorable Jennifer L. Rochon
United States District Court
Southern District of New York
April 18, 2023
Page 2

We thank Your Honor for consideration of this matter.

Respectfully submitted,

/s/Debra L. Wabnik

Debra L. Wabnik

DLW\sh

cc: Meredith Cavallaro, Esq.
 Lisia Leon, Esq.
 Elisabeth Ponce, Esq.
 Paduano & Weintraub LLP

The requests are GRANTED in part and DENIED in part.

The request to extend discovery is **DENIED**. This is the third request and no reason, let alone a good reason, has been provided for the request.

The Court grants the request to adjourn the April 25, 2023 conference. The conference is adjourned to **June 16, 2023 at 10:30AM**.

Dated: April 19, 2023
New York, New York

SO ORDERED.



JENNIFER L. ROCHON
United States District Judge